

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF NEW YORK**

In re:

The Roman Catholic Diocese of
Ogdensburg, New York,

Debtor.

Hearing Date: April 8, 2025

at 1:00 pm ET

Hearing Location: Alexander Pirnie

U.S. Courthouse and Federal Building 10
Broad Street, Utica, New York

Status Report Deadline: April 1, 2025

Chapter 11

Case No. 23-60507 (PGR)

**STATUS REPORT OF THE OFFICIAL COMMITTEE OF UNSECURED CREDITORS
WITH RESPECT TO CENTURY'S MOTION FOR ENTRY OF AN ORDER
PURSUANT TO BANKRUPTCY RULE 2004 AUTHORIZING CENTURY TO
ENFORCE THE SUBPOENA THE COMMITTEE ISSUED TO GALLAGHER**

The Official Committee of Unsecured Creditors (the “Committee”) of the above-captioned debtor and debtor in possession (the “Debtor” or the “Estate”) in this Chapter 11 Case (the “Bankruptcy Case”), by and through its undersigned counsel, hereby files this Status Report (the “Report”) as requested by the Court at the hearing in connection with the application of Century Indemnity Company as successor to CCI Insurance Company, as successor to Insurance Company of North America (“Century”) for an order under Federal Rule of Bankruptcy Procedure 2004 authorizing Century to enforce the subpoena the Committee issued to Arthur J. Gallagher and Co. and Gallagher Bassett Services, Inc. (collectively “Gallagher”) [Docket No. 849] (the “2004 Motion”).¹

The Committee respectfully submits as follows:

¹ Capitalized terms used and not otherwise defined herein have the meaning ascribed thereto in the 2004 Motion.

STATUS REPORT

1. Following the hearing on March 18, 2025, counsel for the Committee sent an email to counsel for Gallagher, copied on other parties, including counsel for Century and the Diocese, requesting a meet and confer regarding the subpoena to Gallagher (the “Gallagher Subpoena”).

2. Counsel for Century contacted counsel to the Committee and discussed the Gallagher Subpoena. After that discussion, on March 20, 2025 counsel for the Committee sent an email to counsel for Gallagher, copied on other parties, including counsel for Century and the Diocese, requesting the production of certain documents as well as requesting “(i) correspondence from the Diocese asking that Gallagher put in place a litigation hold, (ii) Documents relating to any litigation hold issued by Gallagher, and (iii) any document retention and destruction policies applicable to the Documents associated with the Diocese.” The email further requested a response by March 24, 2025 as to whether or not Gallagher would produce the requested information.

3. Counsel for Gallagher reached out by telephone to counsel for the Committee requesting additional time to respond in light of counsel’s scheduled vacation. On March 25, 2025, counsel for the Committee sent an email to counsel for Gallagher, copied on other parties, including counsel for Century and the Diocese, extending the time for Gallagher to respond until April 1, 2025 at 5:00 pm.

4. Counsel for Century sent an email to counsel for Gallagher and the other parties on March 25, 2025 requesting “Gallagher’s document retention and destruction policy, the litigation hold request that the Diocese sent Gallagher, if any, and Gallagher’s litigation hold before the deadline set by the Court.”

5. On April 1, 2025, counsel for Gallagher responded that it “objects generally to your request for documents,” but offering to meet and confer on April 3, 4 or early next week regarding

the requests.

6. Following the response from counsel for Gallagher, counsel for the Committee is coordinating among the parties to schedule a meet and confer on April 3 or April 4, 2025.

Dated: April 1, 2025
New York, NY

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